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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

- - -

IN RE: TERRORIST ATTACKS : 03-MDL-1570
ON SEPTEMBER 11, 2001 : (GBD) (SN)

- - -

JULY 22, 2021
THIS TRANSCRIPT CONTAINS
CONFIDENTIAL MATERIAL

- - -

Remote Videotaped
Deposition, taken via Zoom, of JONATHAN
MARKS, commencing at 9:00 a.m., on the
above date, before Amanda
Maslynsky-Miller, Certified Realtime
Reporter and Notary Public in and for the
Commonwealth of Pennsylvania.

- - -

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(It is hereby stipulated and agreed by and among counsel that sealing, filing and certification are waived; and that all objections, except as to the form of the question, will be reserved until the time of trial.)

— — —

VIDEO TECHNICIAN: We are now on the record. My name is David Lane, videographer for Golkow Litigation Services. Today's date is July 22nd, 2021. Our time is 9:00 a.m.

This remote video deposition is being held in the matter of the Terrorist Attacks on September 11th, 2001. The deponent today is Jonathan Marks.

All parties to this deposition are appearing remotely and have agreed to the witness being sworn in remotely.

1 in that case was an entirely theoretical
2 possibility, correct?

3 MR. GOETZ: Same objection.

4 THE WITNESS: Like all
5 investigations, Mr. Carter,
6 there's a lot of theory involved
7 and speculation.

8 BY MR. CARTER:

9 Q. Well, I'm just trying to
10 assess whether or not you've ever
11 actually been involved, in a professional
12 capacity, in any investigation that
13 actually involved terrorist financing.

14 Have you been?

15 A. I have never been involved
16 in an investigation that has led to
17 anything related to terrorist financing,
18 no, that's correct.

19 Q. And have you ever worked on
20 any matter involving the possible funding
21 of al-Qaeda in particular, before this
22 litigation?

23 A. Not to my knowledge.

24 Q. And have you ever worked in

1 any counterterrorism capacity for any
2 government?

3 A. No.

4 Q. And do you have any
5 expertise pertaining to the history of
6 al-Qaeda?

7 A. I wouldn't say I'm an
8 expert.

9 Q. And do you have any
10 expertise on any other designated
11 terrorist organizations?

12 A. I wouldn't say I'm an
13 expert, no.

14 Q. And do you have any
15 professional background, prior to this
16 case, studying the funding of al-Qaeda?

17 A. No.

18 Q. Have you ever worked on any
19 matter relating to activities conducted
20 in the Middle East?

21 A. Yes.

22 Q. And what countries were
23 implicated by that work?

24 A. Saudi Arabia is one of them.

1 hours, correct?

2 A. If that's what it says, then
3 that's correct.

4 Q. And all of the 14 hours that
5 include descriptions of reviewing
6 documents are included in the September
7 4, 2020, invoice covering the period July
8 1, 2020, through August 31, 2020.

9 Does that sound accurate?

10 A. It does.

11 Q. And the invoice for the
12 prior period covering June 1, 2020,
13 through June 30, 2020, indicates that you
14 were already involved, during that
15 period, in preparing your report,
16 correct?

17 A. Right.

18 Q. So according to the invoices
19 that we have, you began working on your
20 report before you entered any time for
21 reviewing any documents, correct?

22 A. Well, part of putting my
23 report together would be reviewing
24 documents, so, yes.

1 A. I wouldn't say I reviewed
2 tens of thousands of documents, no. Like
3 I said, that's not the process that we
4 went through -- go ahead.

5 Q. So you review -- you relied
6 on other people to review documents and
7 they provided their analysis to you; is
8 that correct?

9 A. Yes.

10 Q. And how did they provide
11 that analysis to you?

12 A. We would have regular and
13 ongoing discussions.

14 Q. And did they provide any
15 summaries to you relating to their
16 review, analysis or findings?

17 A. I'm sure they summarized it
18 to me, otherwise -- yes. Absolutely,
19 yes. They summarized information for me.

20 Q. And so you relied on those
21 summaries for purposes of developing your
22 opinions and writing your report,
23 correct?

24 A. I relied on those summaries

1 to evaluate whether I believed that those
2 were complete and accurate. And if I
3 thought that we needed more information,
4 I would -- I asked my staff to go back
5 and get me more details.

6 So placing reliance on them,
7 it all depended on many different
8 factors.

9 Q. Well, you considered them in
10 the context of developing your opinions
11 and report in the case, correct?

12 A. Yes.

13 Q. And do you list any of those
14 summaries or any analyses provided by
15 your staff in the documents considered
16 section of your report?

17 MR. GOETZ: Objection.

18 Form.

19 THE WITNESS: I don't have
20 any written summaries. So the
21 answer to that is no.

22 BY MR. CARTER:

23 Q. Well, they didn't provide
24 you any information in writing relating

1 others under your supervision.

2 Do you see that?

3 A. I do.

4 Q. And those two statements
5 together, do they describe your
6 methodology for developing your opinions
7 and preparing your report in this matter?

8 A. I don't think they describe
9 my methodology. I think they outline my
10 qualifications and the documents that I
11 considered, not the complete methodology
12 for formulating my opinions and
13 conclusions.

14 Q. So your report does not
15 describe in full your methodology for
16 developing your opinions and conclusions?

17 A. There's not a methodology
18 section in here, no. That's correct.

19 Q. Just turning to the content
20 of your report and some general issues.

21 Do you agree that auditors
22 and forensic accountants should use terms
23 of art carefully and only where
24 appropriate?

1 BY MR. CARTER:

2 Q. Yes.

3 Were you asked to perform a
4 comprehensive review to identify any and
5 all red flags relating to WAMY and its
6 branch offices during the period in
7 question?

8 A. We were asked to perform a
9 review.

10 Q. And as part of that review,
11 were you asked to identify any things
12 that you saw as potential red flags?

13 A. We were.

14 Q. And did you develop a
15 comprehensive list of things that you saw
16 as red flags?

17 A. That list would be small.

18 Q. Okay. But did you develop
19 one?

20 A. Not a formal list, no.

21 Q. On that same page of your
22 report, you say that the opposing experts
23 are not auditors, accountants, financial
24 experts, certified fraud examiners or

1 oversight?

2 A. I think there's always an
3 opportunity to improve the control
4 environment.

5 Q. And WAMY recognized that
6 need in 1997, in your opinion, correct?

7 A. I believe they recognized
8 the need to maintain a control
9 consciousness and to implement adequate
10 internal controls from the beginning.

11 Q. But in 1997 they recognized
12 a need for improvement; that's what you
13 say in your report, correct?

14 A. Right.

15 Q. And in support of that and
16 your opinion that WAMY took action at
17 that time, you cite a document that was
18 produced at WAMY -- by WAMY at Bates
19 82520.

20 MR. CARTER: Which, if we
21 can pull it out, it's at Tab 25.
22 Let's mark this as the next
23 exhibit.

24 - - -

1 (Whereupon, Exhibit
2 Marks-964, WAMYSA082520-2521,
3 6/11/97 Letter, was marked for
4 identification.)

5 - - -

6 BY MR. CARTER:

7 Q. And, Mr. Marks, am I
8 correct, this is the document you cite as
9 evidence that WAMY recognized the need
10 for and began to implement more rigorous
11 controls in 1997?

12 A. I'm reviewing it. Hold on.
13 Give me one second. I'm just double
14 checking.

15 Yes.

16 Q. What do you understand this
17 document to be?

18 A. It looks like an outline to
19 improve controls related to their system.

20 Q. Who authored it?

21 A. Well, it's a WAMY document.
22 I don't know specifically who authored
23 it.

24 Q. Okay. And to whom was it

1 Q. Do you see any of those
2 people referenced or copied on this
3 document?

4 A. I don't.

5 Q. Does this document say
6 anything about auditing or financial
7 controls at all?

8 A. Well, the mere fact that
9 they're putting in a computer system is a
10 control. They're enhancing their
11 computer system.

12 Q. Okay. So the establishment
13 of a computer system, you believe,
14 reflected an effort on the part of WAMY
15 to implement more robust auditing and
16 financial controls?

17 A. I do.

18 Q. Does the document say
19 anything about using that computer system
20 for purposes of centralizing financial
21 reporting or auditing?

22 A. I think it's inherent in
23 what they're trying to achieve. They
24 link together. To better -- it's

1 Form.

2 THE WITNESS: I don't know
3 that -- I don't know that to be
4 true or not.

5 BY MR. CARTER:

6 Q. Well, you described this as
7 an initiative to implement more robust
8 controls.

9 Do you know whether this
10 actually happened?

11 A. I don't know specifically
12 whether it happened or not.

13 Q. Okay. Well, do you agree
14 that if this never happened, this memo
15 wouldn't really provide a firm basis for
16 you to opine that WAMY began implementing
17 more rigorous controls in 1997?

18 A. That would be true. But I
19 haven't seen any evidence to the
20 contrary.

21 Q. And in terms of what this
22 document is and what it isn't, is this a
23 directive or is this an outline of a
24 proposal?

1 document?

2 A. I'm sorry, you just cut out.
3 I didn't hear what you said.

4 Q. Aside from this document,
5 what evidence do you have of
6 implementation of new processes and
7 controls?

8 MR. GOETZ: Objection.
9 Form.

10 THE WITNESS: The project
11 reports are new processes that
12 they put in place and continue to
13 enhance.

14 BY MR. CARTER:

15 Q. Anything else? Anything
16 from the management of the organization
17 discussing new financial and auditing
18 controls?

19 A. I don't know what was
20 discussed with regards to new financial,
21 auditing or management controls.

22 Q. Again, with regard to this
23 initiative to implement an IT control
24 system and whether it actually happened,

1 did you review any information WAMY
2 provided to the court about what its
3 document collection process involved in
4 this case?

5 A. No.

6 Q. And to the extent that WAMY
7 indicated that its document collection
8 involved the collection of physical hard
9 copy documents from the offices and
10 warehouses and did not involve searches
11 of computer-based systems, would that
12 lead you to believe that this IT project
13 didn't happen?

14 MR. GOETZ: Objection.

15 Form.

16 THE WITNESS: I don't know
17 that I can make that particular
18 assumption.

19 BY MR. CARTER:

20 Q. So you don't know whether
21 this actually happened, do you?

22 A. I don't.

23 Q. And, yet, you cite it in
24 your report as evidence of WAMY

1 implementing greater control systems,
2 correct?

3 MR. GOETZ: Objection.
4 Form.

5 THE WITNESS: Can I answer?

6 MR. GOETZ: Go ahead, you
7 can answer if you can.

8 THE WITNESS: I think the
9 fact that they talk about
10 continuously enhancing their
11 overall control environment is a
12 control all in itself.

13 Having a control
14 consciousness and a proper tone
15 from the top, whereby you have an
16 organization that is constantly
17 looking to maintain control, I
18 think that is very important.

19 BY MR. CARTER:

20 Q. Okay. But what you cite in
21 support of that is a single document
22 referring to a possible IT initiative
23 from 1997.

24 A. Well, it's more than a

1 single --

2 MR. GOETZ: Objection.

3 Form.

4 Go ahead and answer.

5 THE WITNESS: It's more than
6 a single document. It's the
7 entire -- it's looking at the
8 entire organization and what they
9 were doing and how they were doing
10 it.

11 BY MR. CARTER:

12 Q. But, again, your report
13 cites this as the -- as the beginning of
14 a process of implementing a more robust
15 centralized organizational accounting
16 system.

17 MR. GOETZ: Objection.

18 Repetitive.

19 BY MR. CARTER:

20 Q. Do you believe it would be
21 appropriate to cite this as the beginning
22 of a process that involved implementation
23 of greater controls if it didn't even
24 happen?

1 MR. GOETZ: Objection.

2 Repetitive.

3 THE WITNESS: If it didn't
4 happen, if you have evidence to
5 show me that it didn't happen,
6 that's fine. I didn't see any
7 evidence to the contrary.

8 BY MR. CARTER:

9 Q. Well, did you see any
10 evidence that it did happen?

11 A. I cited that in my report.
12 I -- what you referred to, what this
13 document is on the screen here right now,
14 that's what I saw.

15 Q. On Page 9 of your report,
16 you referenced what you describe as some
17 statements from plaintiffs' expert
18 reports.

19 Do you see that in the first
20 paragraph?

21 A. Yes.

22 Specifically which are you
23 referring to?

24 Q. The first paragraph,

1 is on Page 8, where I talk about
2 implementing financial controls is in
3 line with practices of large
4 international and not-for-profit
5 organizations.

6 Q. I'm sorry, Mr. Marks, I'm
7 focused on this paragraph because I don't
8 understand -- I don't fully understand
9 it. And I'm just asking very specific
10 questions.

11 Do you take issue with Mr.
12 Winer's statement that there was a fatwa
13 issued to kill Americans in 1998?

14 A. I'm not disputing that.

15 Q. Do you take issue with Mr.
16 Levitt's statement that by 1999 al-Qaeda
17 had the capacity to conduct major
18 terrorist attacks?

19 A. I'm not disputing that
20 either.

21 Q. And are you disputing Mr.
22 Levitt's opinion that bin Laden used the
23 resources of international Islamic
24 non-governmental organizations to finance

1 terrorist activities?

2 A. I'm not disputing that.

3 Q. Now, the next sentence of
4 your report states, According to the
5 opposing experts, quote, terrorist abuse
6 of such NGOs took place at the local
7 branch office rather than at the
8 organization's headquarters, period, end
9 quote.

10 Do you see that?

11 A. I do.

12 Q. And you attribute that
13 statement in quotes to plaintiffs'
14 experts, correct?

15 A. Yes.

16 Q. Where does that quoted
17 language appear in the text of any of
18 their reports?

19 A. You're referring to,
20 Terrorist abuse of such NGOs took place
21 at the local branch rather than at the
22 organization's headquarters?

23 Q. Correct.

24 A. Where does it appear? I

1 A. It's a contract. You know,
2 anybody can sign a contract. It's what
3 you do after that, which is the
4 monitoring of that, which I think is
5 really important.

6 Q. Right. And you told me you
7 didn't know whether or not the contract
8 was enforced.

9 A. Well, if the contract was
10 enforced or not, the fact that they were
11 monitoring would be a really good
12 indication on whether they were following
13 the terms and conditions.

14 Q. In the context of that
15 particular program, right?

16 A. Correct. Correct.

17 Q. The next sentence of your
18 report says that, Supporting refugees and
19 orphans affected by wars does not equate
20 to terrorism and is in line with WAMY's
21 stated charitable goals.

22 Do you see that?

23 A. I do. It's on Page 10.

24 Q. And I think we can agree

1 that supporting refugees and orphans does
2 not necessarily equate to terrorism.

3 But do you know whether
4 refugee and orphan support programs have
5 ever been used to disguise and conceal
6 funding for terrorism?

7 MR. GOETZ: Objection to
8 form.

9 THE WITNESS: Repeat the
10 question. I'm sorry.

11 BY MR. CARTER:

12 Q. Well, do you know whether
13 refugee and orphan support programs have
14 ever been used to disguise and conceal
15 funding for terrorism?

16 MR. GOETZ: Object to the
17 form. Scope.

18 THE WITNESS: That was not
19 my charge here.

20 BY MR. CARTER:

21 Q. So it's not something that's
22 within your area of expertise?

23 A. No. I think we established
24 that.

1 government has identified as having
2 supported al-Qaeda?

3 MR. GOETZ: Objection.
4 Scope.

5 THE WITNESS: Repeat the
6 question one more time.

7 BY MR. CARTER:

8 Q. What organizations can you
9 name that the United States government
10 has identified as having supported
11 al-Qaeda?

12 A. Not WAMY.

13 Q. Okay. Well, can you name
14 any?

15 A. I don't know of any other
16 specific organizations by name.

17 Q. And, again, here you
18 indicate that the initiative referenced
19 in the 1997 memo would not be in line
20 with organizations that supported
21 al-Qaeda.

22 And we agree that the 1997
23 document relates to IT processes and
24 greater uses of computers?

1 review.

2 BY MR. CARTER:

3 Q. You mention here that the
4 matter relating to Adel Batterjee was
5 referred to Prince Salman, who is now
6 King Salman.

7 Do you see that?

8 A. Where are you referring?
9 Page 12?

10 Q. Yes.

11 A. On May 11th -- I see that,
12 yes.

13 Q. Do you know who Prince
14 Salman was during that time period?

15 A. I don't know his title.

16 Q. Do you know whether he had
17 any role for the Kingdom, during the
18 period preceding these events, in
19 implementing the Kingdom's support for
20 the Afghan jihad?

21 MR. GOETZ: Objection.

22 Scope.

23 THE WITNESS: That's not
24 part of my scope.

1 BY MR. CARTER:

2 Q. Do you know if he had an
3 official role with WAMY?

4 A. Official role? I don't know
5 if he had an official role. I don't
6 believe so.

7 Q. Did you undertake any effort
8 to determine why WAMY was referring this
9 particular matter to a senior Saudi
10 official?

11 A. They were trying to be
12 accountable here.

13 Q. It's fine for the
14 organization to be accountable.

15 But the question is why were
16 they -- why were they involving a senior
17 Saudi official who had no formal role at
18 WAMY at all?

19 MR. GOETZ: Objection.
20 Form.

21 THE WITNESS: It's complete
22 transparency with regards to how
23 they act. And the reason I
24 believe that they were notifying a

1 Saudi official is due to the
2 nature of the way that charitable
3 organizations in Saudi Arabia were
4 set up and the accountability and
5 laws associated with that.

6 BY MR. CARTER:

7 Q. So it's your understanding
8 that the regulatory regime required them
9 to report on matters of this nature to
10 Saudi officials?

11 A. Yes.

12 Q. And is it your understanding
13 that Saudi officials had influence over
14 their activities?

15 MR. GOETZ: Objection to
16 scope.

17 THE WITNESS: I don't
18 believe they had influence over
19 their activities. I didn't see
20 any evidence of that.

21 BY MR. CARTER:

22 Q. Did you consider whether the
23 reporting of this matter to Prince Salman
24 may have indicated that the government of

1 A. There are reports that were
2 submitted. I don't recall whether there
3 were actual audits or not.

4 Q. Do you recall whether you
5 received any audits or audited financial
6 statements pertaining to WAMY's office in
7 Sudan?

8 A. Pardon me? You cut out for
9 one second. Can you just repeat that?

10 Q. Do you recall seeing any
11 audits or audited financial statements
12 for WAMY's office in Sudan?

13 A. I'm not sure. I'd have to
14 go back and double check.

15 Q. Do you recall whether you
16 received any audit reports or audited
17 financial statements pertaining to WAMY's
18 office in Russia?

19 A. Same, I'd have to go back
20 and double check.

21 Q. Do you recall whether you
22 received any audits or audited financial
23 statements for WAMY's office in the
24 Philippines?

1 A. Not certain.

2 Q. Do you recall whether you
3 received any audits or audited financial
4 statements for WAMY's office in Austria?

5 A. Austria not Australia,
6 right?

7 Q. Austria.

8 A. I don't remember seeing any.

9 Q. What about Kenya?

10 A. I don't remember seeing any
11 from Kenya either.

12 Q. What about Kosovo?

13 A. I'm not sure.

14 MR. MOHAMMEDI: Objection.

15 THE WITNESS: Sorry.

16 MR. GOETZ: Object to the
17 form of these questions. It's
18 assuming that there are offices in
19 all of these entities. So with
20 that objection noted.

21 MR. CARTER: Relative to
22 that objection, I verified that
23 you described these as all -- as
24 existing offices in one of your

1 filings to the court.

2 MR. GOETZ: Okay. I'm just
3 preserving the objection for the
4 record in case that's not
5 accurate.

6 BY MR. CARTER:

7 Q. I'm sorry, what about WAMY's
8 office in Nigeria?

9 A. I don't recall seeing
10 anything from Nigeria.

11 Q. What about WAMY's office in
12 Yemen?

13 A. I don't recall seeing
14 anything in Yemen.

15 Q. What about WAMY's office in
16 Kyrgyzstan?

17 A. I don't know. I'd have to
18 check. I'm not sure.

19 Q. Is it fair to say that you
20 don't recall seeing any audits for a
21 number of WAMY offices I just listed?

22 A. I don't know that I can
23 answer that question.

24 MR. GOETZ: Objection to

1 MR. GOETZ: Objection.

2 Form. Misstates his testimony.

3 BY MR. CARTER:

4 Q. Mr. Marks, if we can, turn
5 for a minute to the discussion beginning
6 on Page 14 of your report about the
7 audits and audited financial statements
8 you reviewed.

9 And as I understand it, you
10 refer in this section of your report to
11 14 audit reports for the WAMY Pakistan
12 office covering the years 1994 to 2002.

13 Does that sound right?

14 A. Yes.

15 Q. And three audit reports that
16 were produced by WAMY in Arabic for the
17 WAMY Eastern Province office?

18 A. You're on Page 14? Just
19 show me --

20 Q. The discussion continues.
21 I'm in the section --

22 A. Right, right.

23 Q. -- that covers 14 to 16.

24 A. Right. That's on Page 15.

1 Q. Correct.

2 And with regard to those
3 audit reports that were produced in
4 Arabic, do you speak Arabic or read
5 Arabic?

6 A. No. But members of my team
7 do.

8 Q. Did you receive translations
9 of those documents?

10 A. No.

11 Q. So am I correct that you did
12 not actually review those audits
13 yourself?

14 A. Not true.

15 Q. Okay. Given that they were
16 in Arabic, I'm just trying to understand
17 how you personally reviewed them.

18 A. My team members walked us
19 through those documents.

20 Q. But you didn't receive an
21 actual translation, correct?

22 A. I didn't need to.

23 Q. I'm just asking a simple
24 question.

1 there's a statement, Over the course of
2 centralizing recordkeeping, WAMY
3 gradually became aware of issues in their
4 internal controls and made a
5 conscientious effort to improve any
6 control issues.

7 Do you see that?

8 A. I do.

9 But, Mr. Carter, before we
10 get there, I had mentioned to you
11 previously, when we were talking about a
12 specific -- hold on. Let me pull this up
13 real quick. I apologize.

14 We were talking about the
15 directive, and I told you that we would
16 have a conversation about that particular
17 document. I'm just trying to get you the
18 Bates number.

19 My computer just froze. So
20 just bear with me for one second. It's
21 Bates number WAMYSA082521.

22 Q. Thank you.

23 A. If you just mind -- just
24 noting here, if you look at -- I was

1 trying to find it on the document, it
2 does say office of the assistant
3 secretary general.

4 And my conversations from --
5 you know, with my team in that region
6 told me that because it came from the
7 office of the assistant secretary
8 general, that this does act like a
9 directive. So I just wanted to clarify
10 my response.

11 Q. So it's your understanding,
12 from discussions with your team in Saudi
13 Arabia, that the assistant secretary
14 general for planning at the World
15 Assembly of Muslim Youth had the
16 authority to issue directives on behalf
17 of the secretary general?

18 A. Yes.

19 Q. Okay. And in terms of
20 whether or not this is a directive, he
21 actually asked that the recipient of the
22 document provide suggestions on the
23 project and notes that it will be
24 discussed in the coordination meeting.

1 team and there is reference to the WAMY
2 team.

3 My question is, is there an
4 outside team that is a WAMY team and an
5 inside Baker Tilly team that's the Baker
6 Tilly team?

7 A. No. It's the same thing.

8 Q. And in the 2/28 entry --

9 A. Hold on. I'm sorry.

10 Q. In the 2/28 entry by Paul
11 Zikmund, there's a reference to a call to
12 A-M-I-R.

13 Who is that?

14 A. I don't know.

15 Q. And there's also a reference
16 to -- never mind.

17 Looking at Page 10 of the
18 PDF.

19 A. Hold on. I apologize, my
20 PDFs are not numbered. So if you can
21 give me the dates, that would just be
22 easier.

23 I'm right with you now, Mr.
24 Haefele.

1 INSTRUCTIONS TO WITNESS

2
3 Please read your deposition
4 over carefully and make any necessary
5 corrections. You should state the reason
6 in the appropriate space on the errata
7 sheet for any corrections that are made.

8 After doing so, please sign
9 the errata sheet and date it.

10 You are signing same subject
11 to the changes you have noted on the
12 errata sheet, which will be attached to
13 your deposition.

14 It is imperative that you
15 return the original errata sheet to the
16 deposing attorney within sixty (60) days
17 of receipt of the deposition transcript
18 by you. If you fail to do so, the
19 deposition transcript may be deemed to be
20 accurate and may be used in court.

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ACKNOWLEDGMENT OF DEPONENT

I, _____, do
hereby certify that I have read the
foregoing pages, 1 - 316, and that the
same is a correct transcription of the
answers given by me to the questions
therein propounded, except for the
corrections or changes in form or
substance, if any, noted in the attached
Errata Sheet.

JONATHAN MARKS

DATE

Subscribed and sworn
to before me this
_____ day of _____, 20____.

My commission expires: _____

Notary Public

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